

# Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE JOHNSON & JOHNSON TALCUM  
POWDER PRODUCTS MARKETING,  
SALES PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION

Civ. Action No. 3:16-md-02738 (FLW)  
(LHG)

MDL No. 2738

*THIS DOCUMENT RELATES TO ALL  
CASES*

**DECLARATION OF P. LEIGH O'DELL IN SUPPORT OF THE  
PLAINTIFFS' STEERING COMMITTEE'S RESPONSE IN OPPOSITION TO  
THE MOTIONS FOR RELIEF FROM CMO 7(A) BY THE FERRARO LAW FIRM, P.A.**

I, P. Leigh O'Dell, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true to the best of my knowledge, information and belief:

1. I am a Principal at the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C., and serve as Co-Lead counsel of the Plaintiffs' Steering Committee in the *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Multi-District Litigation* (MDL No. 2738) before the United States District Court for the District of New Jersey. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein.

2. I submit this declaration in support of the *Plaintiffs' Steering Committee's Response in Opposition to Motions for Relief from CMO 7(A) by the Ferraro Law Firm, P.A.*, filed concurrently herewith.

3. On December 18, 2020, I spoke with David Jagolinzer, an attorney with the Ferraro Law Firm, by telephone. During this conversation, Mr. Jagolinzer asked me to facilitate the

provision of the live testimony of Drs. Saed and Plunkett, MDL experts, in the Ferraro Law Firm's upcoming state court trials set to occur before the MDL bellwether trial.

4. I explained that it was the PSC's intent to preserve the testimony of Drs. Saed and Plunkett by videotape deposition so it would be available to be utilized by all counsel with access to MDL work product, but that the videotape depositions had not yet occurred.

5. Both Co-Lead Counsel have been approached by other law firms with state court trial settings and Co-Lead Counsel have taken the same position with regard to providing access to the PSC's experts.

6. Mr. Jagolinzer contacted Co-Lead Counsel again in October 2021 to raise his objection to the common benefit assessment holdback. Mr. Jagolinzer, Co-Lead Counsel Michelle Parfitt and Leigh O'Dell, and Liaison Counsel Chris Placitella spoke by telephone on November 8, 2021, during which Mr. Jagolinzer expressed his objection. When he was informed that his firm had signed a Participation Agreement, making his law firm's cases subject to the assessment holdback, Mr. Jagolinzer admitted that he had no basis for an objection.

7. Thereafter, Mr. Jagolinzer contacted Co-Lead Counsel by email on November 9, 2021, again expressing his objection but acknowledging the firm's assent to the Participation Agreement.

Executed this 4th day of January, 2022, Montgomery, Alabama.

/s/ P. Leigh O'Dell

P. Leigh O'Dell